**UNITED STATES DISTRICT COURT**
**DISTRICT OF MASSACHUSETTS**

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| SINGULAR COMPUTING LLC, | Civil Action No. 1:19-cv-12551-FDS |
| Plaintiff, | |
| v. | |
| GOOGLE LLC, | |
| Defendant. | |

**DECLARATION OF KEVIN GANNON IN SUPPORT OF**
**PLAINTIFF'S OPPOSITION TO GOOGLE LLC'S**
**MOTION FOR PROTECTIVE ORDER**

I, Kevin Gannon, hereby declare as follows:

1.      I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for the plaintiff in this action, Singular Computing LLC ("Singular"). I submit this declaration in support of Singular's opposition to the Motion of defendant, Google LLC ("Google"), for a Protective Order (Dkt. No. 250).

2.      Attached hereto as Exhibit A is a true and correct copy of the transcript of the June 30, 2021 hearing in this case before Magistrate Judge Cabell.

3.      Attached hereto as Exhibit B is a true and correct copy of a letter from Matthias A. Kamber to Paul J. Hayes dated July 2, 2021.

4.      Attached hereto as Exhibit C is a true and correct copy of an email exchange including a message from Matthias Kamber to Kevin Gannon *et al.* dated July 2, 2021.

5.      Attached hereto as Exhibit D is a true and correct copy of the transcript of the attempted deposition of Kamran Shafiei on July 20, 2021.

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6.      Attached hereto as Exhibit E is a true and correct copy of excerpts from the

transcript of the deposition of Catherine Tornabene taken by Singular in this case on April 29,

2021.

7.      The foregoing is true and correct to the best of my current knowledge.

Executed under the pains and penalties of perjury of the United States of America at

Boston, Massachusetts on August 2, 2021.


                                        */s/ Kevin Gannon*